

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

WOMBLE BOND DICKINSON (US) LLP

Ericka F. Johnson (NJ #032162007)
1313 N. Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4337
Email: ericka.johnson@wbd-us.com

Counsel for Ad Hoc Committee of States

In re:

LTL MANAGEMENT, LLC,

Debtor.¹

Case No.: 21-30589 (MBK)

Chapter: 11

Requested Hearing: April 12, 2022,
10:00 a.m.

Hon. Michael B. Kaplan

**NOTICE OF MOTION OF THE AD HOC COMMITTEE OF STATES HOLDING
CONSUMER PROTECTION CLAIMS SEEKING RELIEF WITH RESPECT TO THE
ORDER ESTABLISHING MEDIATION PROTOCOL**

PLEASE TAKE NOTICE that, on April 12, 2022 at 10:00 a.m., or as soon thereafter as counsel may be heard, the Ad Hoc Committee of States Holding Consumer Protection Claims (the “Ad Hoc Committee of States”), by and through its undersigned counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for the entry of an order modifying the Order Establishing Mediation Protocol (Dkt. 1780) (“Mediation Order”).

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, the Ad Hoc Committee of States will rely upon the motion submitted herewith. A separate memorandum of law is unnecessary because the legal basis for the relief sought is set forth in the motion submitted herewith and the motion does not raise any novel issues of law. A proposed form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Ad Hoc Committee of States' undersigned counsel, (b) the Mediation Parties, (c) the Co-Mediators, (d) the Office of the United States Trustee for the District of New Jersey, and (f) any other party entitled to notice no later than April 7, 2022.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: April 1, 2022.

By: /s/ Ericka F. Johnson
Ericka F. Johnson (NJ #032162007)
Womble Bond Dickinson (US) LLP
1313 N. Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4337
Email: ericka.johnson@wbd-us.com

Counsel for the Ad Hoc Committee of States

